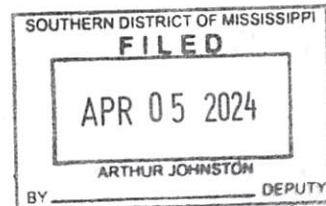


FORM TO BE USED BY PRISONER IN FILING A COMPLAINT UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. § 1983  
IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

## COMPLAINT



Vlasak 236470  
(Last Name) (Identification Number)  
Paul Joseph  
(First Name) (Middle Name)  
South Mississippi Correctional Institute  
(Institution)  
Area II, B1, B-Zone, Bed 18B  
(Address) P.O. Box 1419  
Leakesville, MS 39451

CIVIL ACTION NUMBER: 3:24-cv-194-DPJ-ASH  
(to be completed by the Court)

Marla Hall  
Gratiana Handy  
Todd McAlpin  
Katie Moulds

VitalCore Health Strategies

## GENERAL INFORMATION

- A. At the time of the incident complained of in this complaint were you incarcerated?  
Yes (X) No ( )
- B. Are you presently incarcerated?  
Yes (X) No ( )
- C. At the time of the incident complained of in this complaint were you incarcerated because you had been convicted of a crime?  
Yes ( ) No (X)
- D. Are you presently incarcerated for a parole or probation violation?  
Yes ( ) No (X)
- E. At the time of the incident complained of in this complaint were you an inmate of the Mississippi Department of Corrections (MDOC)?  
Yes ( ) No (X)
- F. Are you currently an inmate of the Mississippi Department of Corrections (MDOC)?  
Yes (X) No ( )

PARTIES

I. Name of plaintiff: Paul Joseph Vlasak Prisoner Number: 236470

Address: South Mississippi Correctional Institute, Area II, B1, B-Zone, Bed 183

P.O. Box 1419

Leakesville, MS 39451

II. Defendant: Marla Hall is employed as RN, Director of Nursing,

VitalCore Health Strategies at Madison County Detention Center

PLAINTIFF:

NAME:

Paul Joseph Vlasak

ADDRESS:

SMCI, Area II, B1, B-Zone, Bed 183

P.O. Box 1419 Leakesville, MS 39451

DEFENDANT(S):

NAME:

VitalCore Health Strategies

ADDRESS:

719 SW Van Buren St., Ste. 100 Topeka, KS 66603

Gratiana Handy, MCDC Supervisor

2935 Hwy. 51 Canton, MS 39046

Todd McAlpin, Madison County ADA

P.O. Box 121/3390 N. Liberty St. Ste. B Canton, MS 39046

Katie Moulds, Madison County ADA

P.O. Box 121/3390 N. Liberty St. Ste. B Canton, MS 39046

### OTHER LAWSUITS FILED BY PLAINTIFF

#### NOTICE AND WARNING

The plaintiff must fully complete the following questions. Failure to do so may result in your case being dismissed.

- A. Have you ever filed any lawsuits in a court of the United States? Yes ( ) NO (X)
- B. If your answer to A is yes, complete the following information for each and every civil action and appeal filed by you. (If there is more than one action complete the following information for the additional actions on the reverse of this page or additional sheets of paper.)

#### CASE NUMBER 1.

1. Parties to the action: \_\_\_\_\_  
\_\_\_\_\_
2. Court (if federal court, name the district; if state court, name the county): \_\_\_\_\_  
\_\_\_\_\_
3. Docket Number: \_\_\_\_\_
4. Name of judge to whom case was assigned: \_\_\_\_\_
5. Disposition (for example: was the case dismissed? If so, what grounds? Was it appealed? Is it still pending?) \_\_\_\_\_  
\_\_\_\_\_

#### CASE NUMBER 2

1. Parties to the action: \_\_\_\_\_  
\_\_\_\_\_
2. Court (if federal court, name the district; if state court, name the county): \_\_\_\_\_  
\_\_\_\_\_
3. Docket Number: \_\_\_\_\_
4. Name of judge to whom case was assigned: \_\_\_\_\_
5. Disposition (for example: was the case dismissed? If so, what grounds? Was it appealed? Is it still pending?) \_\_\_\_\_  
\_\_\_\_\_

STATEMENT OF CLAIM

III.

On February 14, 2022, the Defendant, Marla Hall, RN, Director of Nursing,  
employed by VitalCore Health Strategies, LLC, who provides all medical and  
mental health services for Madison County Detention Center, retaliated  
against Plaintiff for formally complaining by submitting two grievances  
and a motion for injunction on Vitalcore and exhausting administrative remedies.  
The Defendant, Marla Hall, intentionally and knowingly broke Federal law by  
the unauthorized disclosure of patient confidential psychiatric medical  
information without the explicit consent of the plaintiff violating Plaintiff's  
(continued)

RELIEF

IV.

Monetary damages for unauthorized disclosure of confidential medical and psychiatric  
information, defamation of character, invasion of privacy as well as severe stress and mental  
anguish suffered from these actions. Punitive damages for these blatant acts of retaliation  
that violated well established State and Federal rights.

Signed this 3rd day of April, 2024.

I declare (or certify, verify or state) under penalty of perjury that the foregoing is true  
and correct.

Paul J. Thosak  
Signature of plaintiff

## STATEMENT OF CLAIM

Constitutionally protected right to privacy in violation of the Health Insurance  
Portability and Accountability Act (HIPAA) and 42 U.S.C.A. § 1320d-6 by emailing  
an unsubstantiated allegation and unlawfully disclosing Plaintiff's confidential  
psychiatric medical information to Madison County Detention Center Supervisor  
Gratiana Handy, who in turn violated Plaintiff's same rights by forwarding  
the allegation and confidential psychiatric medical information in said email  
to ADA Todd McAlpin on February 22, 2022. ADA Todd McAlpin continued  
this chain of blatantly violating Plaintiff's Federally protected rights by  
sending the same email to ADA Katie Moulds, who was assigned to Plaintiff's  
unrelated criminal case on April 18, 2022 at 11:28 A.M., vindictively, as this  
was approximately one hour before Plaintiff's sentencing hearing. ADA Katie  
Moulds received and used this unsubstantiated allegation and email  
containing confidential psychiatric medical information. ADA Katie Moulds  
disclosed the said info to the Circuit Court Judge in open court, therefore  
continuing this HIPAA violation of Plaintiff's well established rights  
with total deliberate indifference to said rights. The listed Defendants  
negligently failed to safeguard Plaintiff's privacy and Federally protected  
rights pursuant to duty imposed by common law and HIPAA. This  
destroyed the reputation of the Plaintiff and any consideration for  
(continued)

STATEMENT OF CLAIM

leniency. The Plaintiff then received the maximum sentence allowed, with  
all counts to be served consecutively, day for day, with no possibility of  
parole. This excessively harsh sentence was caused by the Defendants' breach  
of Federally protected rights.